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10 *fka CHRISTA SHEDD and*
11 *BRADLEY RANDALL*

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 METROPOLITAN LIFE INSURANCE
11 COMPANY,

12 Plaintiff,

13 v.

14 DAVID M. DOWNES, DANIEL R.
15 DOWNES, COLLEEN P. DOWNES,
16 KAREN A. MACAULAY, BRADLEY
17 RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS CHRISTA D.
SHEDD and BRADLEY RANDALL TO
RESPOND TO DEFENDANT KAREN
A. MACAULAY'S MOTION FOR
PROTECTIVE ORDER**

[FIRST REQUEST]

18 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
19 attorneys that Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall may have
20 additional time, up to and including August 11, 2023, within which to file their response/opposition
21 to Defendant Karen A. Macaulay's Motion for Protective Order [Doc. 38] Therefore, the last day for
22 Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall to file their
23 response/opposition to the Motion for Protective Order [Doc. 38] will be August 11, 2023. The
24 hearing on Defendant Karen A. Macaulay's Motion for Protective Order is presently scheduled to be
25 heard on September 26, 2023, and as such, no prejudice will result to the Parties as a result of the
26 requested extension of time.
27
28 . . .

Good cause exists as the Parties are actively discussing a possible resolution of the matters pending before this Court. Moreover, counsel for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall is scheduled to be outside the jurisdiction on the July 24, 2023, which is the date that the response would otherwise be due to be filed with the Court, and is expected to return to the office on or about July 31, 2023.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendants Christa D. Shedd nka Christa Downes and Bradley Randall hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Counsel for Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

DATED this 17th day of July, 2023.

CLARK MCCOURT

/s/ Lukas B. McCourt
Brian P. Clark (Nevada Bar No. 4236)
7371 Prairie Falcon Road, Suite 120
Las Vegas, NV 89128
*Attorneys for Defendants David R. Downes,
Daniel Downes, Colleen P. Downes, and
Karen A. Macaulay*

DATED this 17th day of July, 2023.

NEHME-TOMALKA AND ASSOCIATES

ORDER

IT IS SO ORDERED

DATED: 12:00 pm, July 18, 2023

John 1:1-2

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

/s/ *Doris Nehme-Tomalka*

Doris Nehme-Tomalka (Nevada Bar No. 6431)
2620 Regatta Drive, Suite 102
Las Vegas, NV 89128
Attorney for Defendant
Christa Downes aka Christa Shedd and
Bradley Randall